

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

TALI WASHBURN,

Plaintiff,

v.

C6-ZERO, LLC; C6-ZERO IOWA, LLC;  
C6-ZERO HOLDINGS, LLC; SECOND-61,  
LLC; ABACUS SOLUTIONS GROUP,  
LLC; BRAND TECHNOLOGIES  
CORPORATION; DORE LAW GROUP,  
LLC; BRANDLICH ASSETS, LLC;  
BRANDLICH CONSTRUCTION, LLC;  
BRANDLISH ENERGY SOLUTIONS,  
LLC; BRANDLISH ENERGY  
SOLUTIONS HOUSTON, LLC;  
BRANDLICH ENERGY SOLUTIONS  
SAN ANTONIO, LLC; BRANDLICH  
ENERGY SOLUTIONS CASPER, LLC;  
BRANDLICH ENERGY SOLUTIONS  
OREGON, LLC; BRANDLICH ENERBY  
SOLUTIONS SAN JOAQUIN; BRAND  
TECHNOLOGIES, LLC, HOWARD  
BRAND; TIM DORE; CHRISTOPHER  
KOEHN; BUFFY KOEN; SHANE  
PULVER; JOE LAVIGNE; MARVIN  
ODUM; JOHN DOE ENTITY  
DEFENDANTS; and JOHN DOE  
DEFENDANTS,

Defendants.

Case No. 24-CV-67-LTS-EM

**DEFENDANT JOE LAVIGNE’S  
MOTION TO SET ASIDE  
ENTRY OF DEFAULT  
AGAINST JOE LAVIGNE**

Defendant, Joe Lavigne (“Lavigne”), by and through counsel, hereby moves to set aside the default entered against him under Fed. Rule Civ. Proc. 55(c) on the following grounds:

**CERTIFICATE OF CONFERRAL**

Counsel for Lavigne has attempted to confer in good faith with Counsel for Tali Washburn (“Washburn”) concerning the *Motion to Set Aside Entry of Default Against Joe Lavigne* (the

“Motion”) on December 15, 2025 and December 16, 2025. Through Counsel for Washburn and Counsel for Lavigne discussed the Motion, Counsel for Washburn did not ultimately indicate Washburn’s position on the relief requested herein.

1. Washburn’s original *Pro Se Compliant with Jury Demand* was filed on July 12, 2024. (Doc. No. 2)

2. Washburn filed her *First Amended Complaint & Demand for Jury Trial* on September 2, 2024. (Doc. No. 5).

3. Washburn filed her *Motion for Entry of Default Against Defendants Joe Lavigne and Brand Technologies Corporation* (“Motion for Default”) on January 20, 2025. (Doc. No. 77).

4. The Motion for Default was granted by the clerk of this Court on January 21, 2025. (Doc. No. 21).

5. Washburn filed her *Second Amended Complaint with Jury Demand* on May 28, 2025. (Doc. No. 147).

6. Plaintiff filed her *Third Amended Complaint and Demand for Jury Trial* (“Third Amended Complaint”) on December 4, 2025. (Doc. No. 194).

7. Lavigne’s default should be set aside as good cause has been shown under Fed.R.Civ.P. 55(c) for the default to be set aside and for Lavigne to be able to defend the claims on the merits.

8. This motion is filed concurrently with Lavigne’s *Brief in Support of Defendant Joe Lavigne’s Motion to Set Aside Default of Joe Lavigne*.

WHEREFORE, Defendant Joe Lavigne requests this Court set aside his default and allow him to file a responsive pleading to the Third Amended Complaint.

Respectfully submitted on December 18, 2025.

/s/ Paul L. Vorndran

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*Attorney for Joe Lavigne*

**CERTIFICATE OF SERVICE**

I, Emily Morse-Lee, certify that on this 18<sup>th</sup> day of December 2025, the foregoing was electronically served via CM/ECF on all parties via their counsel of record as follows:

All counsel of record.

/s/ Wendy Empey